

STEVEN G. SKLAVER (237612)
ssklaver@susmangodfrey.com
OLEG ELKHUNOVICH (269238)
oelkhunovich@susmangodfrey.com
ROHIT D. NATH (316062)
rnath@susmangodfrey.com
NICHOLAS N. SPEAR (304281)
nspear@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, California 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

TAYLOR H. WILSON, JR. (*pro hac vice*)
twilson@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Attorneys for Plaintiffs
AMANDA HOUGHTON, CHARLES DOUGLAS,
and SUSAN FRANKLIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMANDA HOUGHTON, CHARLES
DOUGLAS, and SUSAN FRANKLIN, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

COMPOUND DAO, a California general
partnership; ROBERT LESHNER; GEOFFREY
HAYES; AH CAPITAL MANAGEMENT,
LLC; POLYCHAIN ALCHEMY, LLC; BAIN
CAPITAL VENTURES (GP), LLC;
GAUNTLET NETWORKS, INC.; PARADIGM
OPERATIONS, LP,

Defendants.

JASON HARROW (308560)
jason@gerstein-harrow.com
GERSTEIN HARROW LLP
3243B S. La Cienega Blvd.
Los Angeles, California 90016
Telephone: (323) 744-5293

JAMES CROOKS (*pro hac vice*)
jamie@fairmarklaw.com
MICHAEL LIEBERMAN (*pro hac vice*)
michael@fairmarklaw.com
FAIRMARK PARTNERS, LLP
1001 G Street NW, Suite 400 East
Washington, DC 20001
Telephone: (619) 507-4182

CHARLES GERSTEIN (*pro hac vice*)
charlie@gerstein-harrow.com
GERSTEIN HARROW LLP
1001 G Street NW, Suite 400 East
Washington, DC 20001
Telephone: (202) 670-4809

Case No. 3:22-cv-7781-WHO

CLASS ACTION

**DECLARATION OF NICHOLAS N.
SPEAR IN SUPPORT OF MOTION FOR
LEAVE TO AMEND FIRST AMENDED
COMPLAINT**

DATE: December 18, 2024
TIME: 2:00 p.m.
PLACE: Courtroom 2
BEFORE: Hon. William H. Orrick

1 I, Nicholas N. Spear, hereby declare as follows:

2 1. I am a member in good standing of the bar of the State of California, a partner with
3 the law firm of Susman Godfrey L.L.P., and counsel of record for Lead Plaintiffs Amanda
4 Houghton, Charles Douglas, and Susan Franklin. I have personal knowledge of the facts set forth
5 herein, and if called as a witness, would testify competently thereto.

6 2. I make this declaration in support of Lead Plaintiffs' Motion for Leave to Amend
7 First Amended Complaint.

8 3. Attached as Exhibit 1 is a true and correct copy of Lead Plaintiffs' proposed Second
9 Amended Complaint.

10 4. Attached as Exhibit 2 is a true and correct copy of a redline comparing Lead
11 Plaintiffs' proposed Second Amended Complaint to Lead Plaintiffs' First Amended Complaint
12 (Dkt. 76).

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed this 4th day of November, 2024, at Los Angeles, California.

16 By: /s/ Nicholas N. Spear

17 Nicholas N. Spear
18 nspear@susmangodfrey.com
19 **SUSMAN GODFREY L.L.P.**
20 1900 Avenue of the Stars, Suite 1400
21 Los Angeles, California 90067-6029
22 Telephone: (310) 789-3100
23 Facsimile: (310) 789-3150
24
25
26
27
28